

NEW MEXICO
HEALTH AND ENVIRONMENT
DEPARTMENT

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ENVIRONMENTAL IMPROVEMENT DIVISION

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July 7, 1987

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Richard Tavelli
Director of Administration and Environmental Affairs
Transwestern Pipeline Company
PO Box 1188
Houston, TX 77251-1188

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Dear Mr. Tavelli:

REORGANIZED

Thank you for your recent letter describing Transwestern's past, ongoing, and proposed investigative and remedial work at the four Compressor stations in New Mexico. We appreciate the fact that Transwestern has already expected a significant effort addressing potential PCB problems at these sites. We also understand that Transwestern is committed to resolving health concerns related to PCB wastes at these sites. My comments were/are intended as constructive criticisms directed at specific situations which, in my view, deserved additional work beyond that already performed. Please do not misconstrue my remarks to suggest that work done to date was not timely or valuable.

We appreciate Transwestern's willingness to consider additional fencing. Efforts taken to inform and educate workers and their families, combined with existing exclusionary measures, are probably sufficient to protect adults. However, the same cannot be said for children. Warning children to stay away from an area often has just the opposite effect. The warning signs posted are very small and widely spaced, and young children may not be able to read them or comprehend their meaning. Two-or three-strand barbedwire fences will not exclude children. Given the low cost of secure fencing relative to the cost of other investigation and remedial work already undertaken, it would seem to be good policy to convincingly prevent unauthorized entry into contaminated areas.

It clearly is important to know which areas are contaminated and should be fenced. The data available to us are not persuasive in that regard. However, perhaps we do not have all the data. For example, which of the field tests were done with the McGraw-Edison test and which resulted from Transwestern's field GC? The data we have (Woodward-Clyde, April 1987) show a dismaying lack of correlation between field and lab results. Comparison of field and lab results at our disposal indicates that one sample may produce low PCBs in the field test, but high PCBs in the lab test, while another sample will exhibit just the reverse. By the way, was your commercial lab approved by EPA?

Regarding offsite migration we have a couple of comments. Downward migration of PCBs in the soil usually is limited, as suggested on page 3 of your letter. Nevertheless, discovery of PCBs at the bottom of subsurface borings at Corona and Laguna indicates that PCBs in fact did migrate downward. Vertical migration cannot simply be dismissed as unlikely, particularly at the Laguna site where there is shallow ground water.

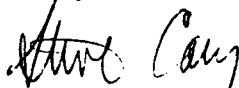
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We appreciate Transwestern's prompt action to fence offsite contamination on state land at the Corona site. We trust that this fencing will be secure enough to exclude livestock as well as people. The next step will be to remove the contaminated soil. If left in place, wind and runoff will eventually transport it to unfenced areas. Erosion and runoff of PCB-contaminated soils appears to be of greatest concern at Corona. Runoff/erosion control at this site is suspect. First, are the structures designed to handle expected runoff from the occasional large storm? Second, we suggest a stronger emphasis on runoff diversion and less reliance on sediment removal. A sediment trap that allows the larger sediment particles to settle out is inadequate. Most PCBs will be associated with clays; if these fine-grained particles are allowed to pass through the system, then most of the PCBs will go with them. We suggest that you submit engineered plans for a runoff/erosion control system that effectively prevents offsite transport of PCBs.

The impoundment at the Laguna station needs attention beyond discontinuing use and drainage. Because the pit is so poorly fenced, it presents physical as well as chemical hazards. Transwestern should submit plans for decontamination and secure closing of the impoundment.

I look forward to a continued good working relationship. If you have any questions regarding the above comments, please telephone me at (505) 827-2898.

Sincerely,



Steven J. Cary, Program Manager
Superfund Section
Hazardous Waste Bureau, EID

SJC:dlr

cc: ~~Doug Fassett, 6H-ES, USEPA, Dallas, TX 75202-2733~~

Enclosures